

EXHIBIT A

WIGGINS V. THE CITY OF MONTGOMERY

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

MARY WIGGINS,)
Plaintiff,)
)
v.)
)
CITY OF MONTGOMERY,)
Defendant.)

Case No. 2:17-cv-425-KFP

PLAINTIFF'S MOTION FOR
AN AWARD OF ATTORNEY'S FEES AND EXPENSES

EXHIBIT A – Declaration of Heather Newsom Leonard

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

MARY WIGGINS,)
Plaintiff,)
)
v.) Case No. 2:17-cv-425-KFP
)
CITY OF MONTGOMERY,)
Defendant.)

DECLARATION OF HEATHER LEONARD IN SUPPORT OF MARY
WIGGINS MOTION FOR AN AWARD OF FEES AND EXPENSES

1. My name is Heather Leonard. I practice in all courts in the state of Alabama and maintain an office in Birmingham. I make this declaration based on my personal knowledge.

Leonard's Qualifications and Familiarity with Employment Law

2. I graduated from the University of Alabama School of Law in 1998 and was admitted to the Alabama State Bar that same year. While in law school, I was a member of the John A. Campbell Moot Court Board and the National Moot Court Team. I also was the Managing Editor for the *Law and Psychology Review* and served as the secretary for the Student Bar Association.

3. I practice not only in state court in Alabama, but also before the United States District Court for the Northern District of Alabama, United States District Court for the Middle District of Alabama, United States District Court for the Southern District of Alabama, and the United States Court of Appeals for the Eleventh Circuit. I also serve as a private mediator and arbitrator.
4. Since 1998, I have focused my practice of law on the area of employment and civil rights litigation. I currently represent both Plaintiffs and Defendants in employment discrimination cases. I have tried numerous jury trial cases in the United States District Courts in Alabama since 1998 and have argued numerous appellate cases before the United States Court of Appeals for the Eleventh Circuit.
5. I currently serve as the Vice-President on the board of the Alabama State Bar's Labor and Employment Section and am president of the Alabama affiliate for the National Employment Lawyers Association ("NELA").
6. I have written the following articles:
 - a. *The Family and Medical Leave Act - Does it Apply to Job Applicants;* Birmingham Bar Association Bulletin, Winter 2000
 - b. *Military Leave: and Employer's Basic Obligations;* Birmingham Bar Association Bulletin, Spring 2003

- c. *Proceed with Caution: Hiring of Legal Support Staff - An Analysis of Opinion of the General Counsel, Opinion No. 02-01*; Birmingham Bar Association Bulletin, Fall 2002
 - d. *Can An Employer Be Held Liable Under The Federal Anti-Discrimination Laws For Failure To Provide Health Insurance Coverage For Assisted Reproductive Technology?*; Birmingham Bar Association Bulletin, Fall 2001.
7. In addition to serving as adjunct faculty at the University of Alabama at Birmingham in 2002 and 2003 (teaching trial advocacy, mediation, and mock trial), I serve on the planning committee for the Cumberland School of Law Annual Labor and Employment CLE and have taught at the numerous legal seminars, including:
- a. *National Employment Lawyers Association – E-Discovery and ESI for the Plaintiffs' Employment Lawyer* (2022)
 - b. *National Employment Lawyers Association (Alabama Affiliate) – Eleventh Circuit Caselaw Update for Employment Law* (2022)
 - c. *University of Alabama CLE – Employment Law Update* (2021)
 - d. *Cumberland School of Law –Annual Employment Law Update* (2021)
 - e. *National Employment Lawyers Association – Pretrial Powerhouse: Skills for Success from ESI to Trial Day* (2021)

- f. *National Consumer Law Center Class Action Symposium – Making ESI and Integral Part of Your Litigation Practice* (2021)
- g. *National Employment Lawyers Association’s Annual Conference* (2021)
- h. *University of Alabama CLE – Employment Law Update* (2020)
- i. *Cumberland School of Law –Annual Employment Law Update* (2020)
- j. *Alabama State Bar Labor & Employment Section’s Annual Conference* (2020)
- k. *National Employment Lawyer’s Association’s National Conference* (2020)
- l. *NELA-Alabama - Discovery During a Pandemic* (2020)
- m. *NELA-Alabama – Surviving Summary Judgment: Unlocking the Doorway to Trial* (2019)
- n. *National Employment Lawyer’s Association’s National Conference* (2019)
- o. *Cumberland School of Law –Annual Employment Law Update* (2018)
- p. *Alabama State Bar Labor & Employment Section’s Annual Conference* (2018)
- q. *National Employment Lawyer’s Association’s National Conference* (2018)

- r. *Balch & Bingham's 2018 Labor & Employment Seminar* (2018)
- s. *National Employment Lawyer's Association's Spring Symposium – ESI & Technology for the Plaintiff's Employment Lawyer* (2018)
- t. *Legal Aspects of Sexual Harassment & the Psychological Aspect of Sexual Harassment & Sex Abuse* (2017 hosted by the Alabama Association for Justice ALAJ)
- u. *Cumberland School of Law – 24 Annual Employment Law Update* (2017)
- v. *Alabama State Bar Labor & Employment Section's Annual Conference* (2017)
- w. *National Employment Lawyer's Association Trial Bootcamp* (2017)
- x. *National Employment Lawyer's Association's National Conference* (2017)
- y. *Alabama State Bar Labor & Employment Section's Annual Conference* (2016)
- z. *National Employment Lawyer's Association Summary Judgment Symposium* (2016)
- aa. *National Employment Lawyer's Association's National Conference* (2016)
- bb. *National Employment Lawyer's Association Trial Bootcamp* (2015)

- cc. *Cumberland School of Law – 22 Annual Employment Law Update* (2015)
- dd. *Cumberland School of Law – 21 Annual Employment Law Update* (November 14, 2014)
- ee. *Alabama National Employment Lawyers Association’s CLE* (January 10, 2014)
- ff. *Cumberland School of Law – 20 Annual Employment Law Update* (December 6, 2013)
- gg. *The Basics of Employment Law – FMLA, Title VII, ADA and FLSA --* Birmingham Bar Association (August 9, 2013)
- hh. *Cumberland School of Law – 19 Annual Employment Law Update* (November 16, 2012)
- ii. *Alabama State Bar – Labor & Employment Law Section – 2012 Seminar on the Gulf* – (October 12, 2012)
- jj. *Cumberland School of Law – 18 Annual Employment Law Update* (December 2, 2011)
- kk. *The Intersection of the ADAAA and FMLA* - – Birmingham Bar Association (August 19, 2011)
- ll. *Employment Law Basics for the Non-Employment Lawyer* – Birmingham Bar Association (May 13, 2011)

- mm. *Navigating Employment Discrimination Claims* – Birmingham Bar Association (February 10, 2011)
- nn. *Cumberland School of Law – 17 Annual Employment Law Update* (December 3, 20010)
- oo. *University of Alabama School of Law Annual Employment Law Seminar* (December 3, 2010)
- pp. *Cumberland School of Law – 16 Annual Employment Law Update* (December 4, 2009)
- qq. *2009 Annual Meeting of NELA Alabama* (November 13, 2009)
- rr. *Getting Started in Federal Court* – National Business Institute (June 9, 2009)
- ss. *Fundamentals of Employment Law* – Sterling Education Services, Inc. (April 16, 2009)
- tt. *Rules and Procedures for Federal Court Success* – National Business Institute (February 27, 2009)
- uu. *Cumberland School of Law – 15th Annual Employment Law Seminar* (December 5, 2008)
- vv. *Employment Law Update* -Sterling Education Services, Inc.(November 19, 2008)

- ww. *The Mechanics of Alabama Civil Procedure* – National Business Institute (August 27, 2008)
- xx. *Discovery Skills for Legal Staff* – Sterling Education Services, Inc. (April 29, 2008)
- yy. *Employee Discharge and Documentation* - National Business Institute; Birmingham, AL (February 6, 2008)
- zz. *Cumberland School of Law* – Annual Employment Law Update (December 7, 2007)
- aaa. *Family and Medical Leave Act in Alabama* - Lorman Education Services; Birmingham, AL (August 22, 2007)
- bbb. *Employment Law Update* - Sterling Education Services, LLC; Birmingham, AL (June 26, 2007)
- ccc. *Immigration & Employment Law Update* - Sterling Education Services, LLC; Birmingham, AL (March 27, 2007)
- ddd. *Employment Law Update* - Cumberland School of Law CLE; Birmingham, AL (December 1, 2006)
- eee. *Litigating the Plaintiffs Employment Discrimination Case in Alabama* - Lorman Education Services; Birmingham, AL (August 30, 2006)
- fff. *Family and Medical Leave Act in Alabama* - Lorman Education Services; Birmingham, AL (April 6, 2006)

- ggg. *Fundamentals of Employment Law* - Sterling Education Services, LLC; Birmingham, AL (May 16, 2006)
- hhh. *Simple Ways to Prevent Human Resources Claims* - National Business Institute; Birmingham, AL (January 2006)
- iii. *Practical Applications of Employment Law in Alabama* - Sterling Education Services, LLC; Birmingham, AL (February 2004)
- jjj. *Common Misconceptions in Human Resource Law* - Lorman Education Services; Birmingham, AL (May 2005)
- kkk. *Personnel Law Update* - Council (sponsored by *Constangy Brooks & Smith, LLC*); Birmingham, AL (April 2005)
- lll. *Fundamental Issues in Alabama Human Resources Law* - National Business Institute; Birmingham, AL (November 2004)
- mmm. *Alabama Wage and Hour Regulations and Recent Developments* - National Business Institute; Birmingham, AL (December 2004)
- nnn. *Ethics Seminar: Strategy for Success - Rules Governing Communications with a Person Represented by Counsel* - ABICLE; Tuscaloosa, AL (October 2004)
- ooo. *Legal Ethics in Alabama* - Lorman Education Services; Birmingham, AL (January 2005)

- ppp. *CLE By the Hour - The Ethical Implications of Contacting Employees of an Opposing Party* - Cumberland School of Law Continuing Legal Education; Birmingham, AL (December 2001; December 2002)
- qqq. *Internet Strategies for the Paralegal in Alabama* - National Business Institute; Birmingham, AL (February 2003)
- rrr. *Litigation Skills for Legal Staff in Alabama* - Lorman Education Services; Birmingham, AL (January 2005; April 2005; February 23,2006)
- sss. *Select Topics for Legal Staff in Alabama* - Lorman Education Services; Birmingham, AL (April 20, 2006).

8. I have been ranked as one of the Top 25 female attorneys as well as one of the Top 50 overall attorneys in Alabama by Thompson Reuters' Super Lawyers publication. My firm has also been ranked as a Tier One provider of employment law services by U.S. News and World Report's "Best Law Firms." I am AV rated with Martindale-Hubbell.

Reasonableness of Rate Requested

9. I am familiar with the hourly rates of attorneys billed and paid in Alabama and in the Eleventh Circuit in employment discrimination litigation and similar cases requiring comparable skill, effort, and responsibility.

10. My current hourly rate for mediation services is \$450 an hour. In 2018 I received a fee award based on a rate of \$400 an hour in the matter of *Frankenfield v. Acosta Sales, LLC* (5:17-cv-00924-MHH U.S. District Court for the Northern District of Alabama). I have pending (a) before Judge Axon a fee petition from a trial in 2019 where I am seeking approval of an hourly rate of \$450 and (b) before Judge Bowdre a fee petition from a trial in 2021 where I am seeking approval of an hourly rate of \$500. In discussing my rate with other lawyers of comparable experience and skill, I have found my rate to be in the middle of what is acceptable. The prevailing hourly rates for lawyers handling plaintiff's employment case range from \$300 an hour to \$650 per hour depending on the skill of the litigator. The rates are reasonable because of the high risk in employment cases. Over the past few years Amanda Farahany has presented at both the Alabama Bar's Labor and Employment Conference and the Cumberland School of Law's Annual Employment Law Update the crushing summary judgment among District Courts in the Eleventh Circuit. The study showed that summary judgment was granted in more than 70% of the employment discrimination cases filed. As a result of the high summary judgment rates, the number of qualified attorneys willing to take on the risk of an employment discrimination case has dramatically dropped. I have observed this decline in monitoring the membership of the Alabama affiliate for the

National Employment Lawyers Association. I have seen qualified and experienced attorneys leave our ranks and reduce the number of employment cases they are taking because of the high risk. Fewer and fewer attorneys entering the profession are joining our organization.

11. Last year, in July 2021 (the same month in which this case was tried), United States District Court Judge Corey Maze awarded attorneys Kira Fonteneau and Sonya Edwards an hourly rate of \$450 in an employment discrimination case that was tried in federal court in Anniston Alabama. A copy of that order is attached as Exhibit 1. I have been practicing seven (7) years longer than Ms. Fonteneau and Ms. Edwards, have tried more jury cases than both Ms.> Fonteneau and Ms. Edwards, have obtained more successful verdicts than them, and have successfully handled more appeals than them. I believe my experience entitles me to a higher hourly rate than they were awarded.
12. Representing employees in employment litigation is risky and difficult. It requires: (1) organization and efficiency in the marshaling of facts, evidence and theories of liability so that false starts or wasted efforts were minimized; (2) a thorough comprehension of the substantive and procedural law and policy arguments; (3) case assessment which weeds out unproductive theories and claims, and which concentrates energies on the points which are most likely to prevail; and (4) experience in presenting evidence and theories to the Court.

Based on my knowledge of the local market for legal services, these characteristics command the requested hourly rate of \$500 for the current case.

13. The risk inherent in handling employment cases is that representation is done on a contingency basis where the lawyer frequently works for years without any compensation.¹ This is the standard form of representation in employment discrimination matters since most plaintiffs are seeking representation at a time that they have lost their job and are unable to afford a retainer, flat-fee, or hourly fee arrangement. When a lawyer accepts an employment case on a contingency basis, he or she knows that the case would involve a tremendous amount of work with the hope of any compensation lying in the distant future. Frequently, that contingency compensation is inadequate to reimburse the lawyer for a fraction of his or her time. Without an attorney's willingness to accept a plaintiff's case on a contingent basis, the plaintiff would likely not be able to obtain representation in the current case in the local market.

¹ As noted above, the number of attorneys handling these types of cases is falling. As president of the Alabama affiliate of the National Employment Lawyers Association, I have seen the number of persons fleeing this area of practice increase because lawyers cannot afford to work for years without payment only to face nominal settlement offers from defendants if summary judgment is denied. Unfortunately, employment litigation is quite lucrative for the defense bar, but only the most skilled and dedicated members of the plaintiffs' bar can remain in this area of practice because of the high risk and low profitability. This is not because good cases do not exist – they do. This trend is because of the high rate at which summary judgment is granted and the low value employers are willing to pay. Therefore, attorneys' fee provisions in these federal statutes are important – they are the only way employees will be able to find lawyers to vindicate their rights.

14. The high rate at which summary judgment is granted deters many lawyers from taking employment cases and heightens the risk of handling these types of cases. Even in strong cases, summary judgment is granted at a high rate. For this reason, most employers/defendants will not engage in meaningful settlement discussions until after the court has ruled on summary judgment; the employers are “playing the odds” that at least part of the case will be resolved in their favor at summary judgment. This means that by the time a case is ready for settlement discussions, a lawyer will have invested a substantial amount of time and expenses in litigation. The high risk of handling employment cases on a contingency basis weigh heavily in favor of a solid hourly rate so that experienced and qualified litigators will take these cases which serve an important public interest. I am a solo practitioner with limited staff.² I cannot afford the staff of a large firm because there is no guarantee as to when I will receive my next payment/fee. It would be irresponsible to commit myself to a payroll without the knowledge that I would be able to regularly meet it. This means that except for filing, I am doing all the work on any case I have accepted. When I accept or take on a case, it means that I do so the exclusion

² My office consists of me, my office manager (who is my husband, Jim Leonard), a part-time paralegal (Christine Poynter), and a part-time clerk (Abby Whitson). Ms. Poynter did not start working for me until late 2019.

of other work so that I can ensure that I have adequate time to handle my cases.³

I do not have another attorney in my firm to whom I can delegate work (or covering matters) when I am out of the office for depositions, court, or trial. When I accept a case, I do so only after reviewing my current case load, discovery deadlines (and associated commitments, such as depositions), dispositive motion deadlines, and trial settings. If I know that agreeing to work on a case will create a conflict with existing deadlines or trial settings, I must decline representation. Therefore, when I accept a contingency fee case, I am doing so knowing not only that I will not get paid for my work for years, but also that it means I will necessarily have to turn down other cases. Because of the time and effort necessary to navigate a case through summary judgment, there are a limited number of cases that they can handle. When a case proceeds to trial, it requires me not only to decline cases but also ensure that my existing case load is manageable because I will have to protect at least a week of trial time prior to the trial setting for preparation as well as the time for the trial itself.

³ Having qualified counsel is a necessity to make sure that there are enough “hands” to handle all the work necessary for prosecuting a case at trial. Because of the smaller recoveries in employment cases (as compared to personal injury cases), the promise of a fee award is often the only reason a group of qualified attorneys can represent a plaintiff; the contingency fee will not come close to covering the time and expenses invested in the case. As is the case here where there is a litigation team of two solo practitioners, the fee award is the only way that our firms will be able to recoup the salary costs of that team in terms of the work expended on the case. Without the fee award, it does not make business sense for us to take employment discrimination cases.

This means that scheduling depositions, completing paper discovery, and managing briefing obligations are challenging.⁴ This is another factor that weighs heavily in finding that his requested hourly rate is reasonable.

Reasonableness of Time Sought

15. I have reviewed the hourly time sought for the preparation and trial of this case against the background of the foregoing factors as explained in *Norman v. Housing Authority of City of Montgomery*, 836F.2d 1292, 1300-1301 (11th Cir. 1988). The time sought is reasonable.
 - a. Starting in 2020, I began using Smokeball, a practice management software, with a billing program that operates on top of Microsoft products. In addition to permitting manual entry of time, Smokeball also tracks the active time the user spends in a Word document and in emails. All billing entries, whether those captured by the software or those entered manually, require the user to review and approve the entries. This ensures not only that the entries are accurate, but also that the lawyer is familiar with the time invested in the case. Attached as Exhibit 2 are my billing records from Smokeball as well as from the

⁴ Because of the COVID 19 pandemic, this case was set and reset for trial several times. This meant that every time the case was set, I had to block out and hold dates for preparation and trial. This created a domino effect in my other cases of having to push deposition dates and discovery deadlines. Because of the continuances of the trial, I closed my office to new cases for several periods of time.

billing software I used prior to 2020. Attached as Exhibit 3 are my expenses records.

- b. I have tried to be efficient and practical in determining what work to invest in the case. When time permitted, I tried to delegate to Ms. Poynter (my part-time paralegal) work which she could complete that did not require my knowledge or experience as a lawyer.
- c. This case was litigated for a considerable amount, beginning with multiple EEOC Charges. Because of the length of the case, I have divided my time in the fee petition as follows:
 - i. Time Spent on Prior EEOC Charges: 18.9 hours
 - ii. Time Spent on the EEOC Charge Underlying this Case: 6.4 hours
 - iii. Time Spent on Litigation through Dispositive Motions: 87.58 hours
 - iv. Post-Dispositive Motion/Trial Time: 131.79 attorney hours; 47.7 paralegal hours for Christine Poynter billed at \$50/hour
- d. The expenses I am claiming in this case are \$5,585.10:
 - i. Filing Fee \$400
 - ii. Transcripts Trial Transcript - \$1,496.95
 - iii. Copies 9,484 pages at \$0.25/page - \$2,371

iv. Witness Fees (Trial) Carmen Douglas \$40.92
Cami Hacker \$40.92
Todd Strange \$47.48
Barry Crabb \$47.13

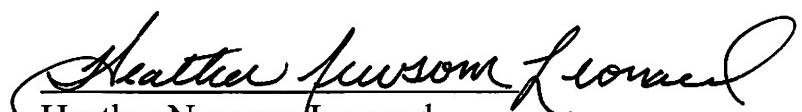
v. Witness Fees (Depo) Carmen Douglas \$45
Charles Wilson \$45

vi. Service of Process \$226 (Depositions of Carmen Douglas
and Charles Wilson)

vii. Deposition Transcripts \$534.50 (Wiggins Depo)
\$290.20 (Wilson and Douglas)

16. I have reviewed the foregoing and declare under the penalty of perjury that it
is truthful and correct.

3-24-22
Date


Heather Newsom Leonard

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
MIDDLE DIVISION

DAWN BARBER,)
)
Plaintiff,)
)
v.) Case No. 4:18-CV-1633-CLM
)
TPC OF BLOUNT COUNTY)
ALABAMA INC.,)
)
Defendant.)

ORDER

This case is before the court on Plaintiff Dawn Barber's Unopposed Motion to Set Attorneys' Rates (doc. 76). Barber requests this Court to enter an Order setting attorneys Sonya Edwards' and Kira Fonteneau' rate as \$450 per hour. After review of the relevant affidavits, the Court **GRANTS** the motion.

DONE and ORDERED on July 1, 2021.



COREY L. MAZE
UNITED STATES DISTRICT JUDGE



Date	Description	Hours	Rate	Total
	Previous Balance			0.00
3/18/2010	initial Client Meeting	3.00	500.00	1,500.00
3/31/2010	letter - client engagement letter to client / cc Burgess	0.40	500.00	200.00
4/22/2010	letter - client letter to client re: damages	0.40	500.00	200.00
4/22/2010	letter - client letter to client re: EEOC charge and preparing narrative	0.30	500.00	150.00
4/29/2010	letter - eeoc letter to eeoc re filing her charge	0.10	500.00	50.00
5/6/2010	A104 Review/analyze Review client's damages worksheet	0.10	500.00	50.00
9/22/2010	A108 Communicate (other external) Review letter from EEOC to Mary Wiggins	0.10	500.00	50.00
9/23/2010	A108 Communicate (other external) Return call of Jonathan Jones at EEOC re Mary Wiggins 212-2074	0.10	500.00	50.00
9/23/2010	letter - client letter to client re eeoc investigator	0.10	500.00	50.00
9/23/2010	letter- eeoc letter to eeoc re position statement/interview	0.20	500.00	100.00
9/24/2010	A108 Communicate (other external) T/c with Jonathan Jones	0.80	500.00	400.00
11/4/2010	letter - eeoc draft RFI letter to EEOC	0.70	500.00	350.00
11/5/2010	letter - eeoc make corrections to eeoc letter drafted 11/4	0.10	500.00	50.00
11/19/2010	A106 Communicate (with client) Call to client re: receipt of RTS - left vm	0.10	500.00	50.00
11/30/2010	A106 Communicate (with client) Return client call (Mary Wiggins 334-207-3716) - left vm	0.10	500.00	50.00
12/6/2010	A106 Communicate (with client) Return client call re: scheduling of meeting	0.20	500.00	100.00
12/14/2010	A109 Appear for/attend Meeting with client, Faulkner and Mills re: resolution of issues	2.00	500.00	1,000.00
1/28/2011	letter - client status letter to client	0.30	500.00	150.00

Time on initial EEOC charges

Date	Description	Hours	Rate	Total
	Previous Balance			
2/11/2011	A106 Communicate (with client) Mary Wiggins is getting anxious about the approaching deadline and wants to talk to you about it. 334-207-3716 cell	0.10	500.00 50.00	
4/21/2011	A111/HL returned her call and left a vm Call to Mary Wiggins re status - told her we were waiting to see if they denied her the next position since she was now working at the counter, and that was what they said it took to make her promotable.	0.30	500.00 150.00	
7/5/2011	A106 Communicate (with client) Call from client - she found out from person "who knows" that the security guard has been told to monitor her comings and goings. Position has gone to another person. It went to John Ashmore. A106 Communicate (with client) Return client call - left vm to call back at her convenience	0.39	500.00 195.00	
7/5/2011	A106 Communicate (with client) Return client call and left vm	0.10	500.00 50.00	
7/11/2011	A106 Communicate (with client) Return client call (334-207-3716) - left vm	0.10	500.00 50.00	
1/23/2012	A106 Communicate (with client) Call from client - two people promoted to field examiner (Lori Withers and John Ashmore), A106 Communicate (with client)	0.30	500.00 150.00	
4/4/2013	Letter to client re: filing of ecoc charge and timeline A107 Communicate (other outside counsel) Letter to Kim Fehl re filing and mediation	0.20	500.00 100.00	
7/29/2013	Letter A106 Communicate (with client)	0.30	500.00 150.00	
8/28/2013	Review and respond to client email of 8/27/13 re retaliation she is experiencing at work from Charles Wilson	0.10	500.00 50.00	
9/4/2013	A106 Communicate (with client) Call w/client about Connie and Chuck being ugly to her	0.90	500.00 450.00	
10/23/2013	A106 Communicate (with client) Return client call (she left a message 10/22 in the evening) - returned her call at 9:48 and left a vm	0.10	500.00 50.00	

Date	Description	Hours	Rate	Total
	Previous Balance			0.00
10/24/2013	call - client RX call from client re her message about applying for the Outside Inspector position. Told her HL had said that she did not need to apply for it, but that if it was a job she wanted and felt that she could perform then by all means to apply. Client indicated that the city knows she can't do it and then began crying	0.10	500.00	50.00
12/10/2013	letter to client	0.02	500.00	10.00
1/6/2014	letter to client regarding status - EEOC	0.10	500.00	50.00
1/6/2014	A106 Communicate (with client) Review and respond to client email re: status of case	0.10	500.00	50.00
1/6/2014	A108 Communicate (other external) Letter to EEOC re additional discrimination and request for meeting	0.17	500.00	85.00
1/31/2014	A106 Communicate (with client) Review 3 emails from MW's daughter Jennifer about her mother being dismissed that day. Tried to call client - left vm; spoke with her daughter	0.30	500.00	150.00
2/1/2014	A106 Communicate (with client) Call to client to discuss what happened on 1/31 re: suspension. Got details	0.60	500.00	300.00
2/1/2014	A107 Communicate (other outside counsel) Email/Letter to Kim Fehl about recent acts of retaliation	0.20	500.00	100.00
2/1/2014	A108 Communicate (other external) Letter to EEOC re: recent retaliation	0.20	500.00	100.00
2/4/2014	correspondence prepare correspondence mailing	0.17	500.00	85.00
2/6/2014	A106 Communicate (with client) Call to client to prep her for her interview with IA	0.30	500.00	150.00
2/6/2014	A108 Communicate (other external) Return call of EEOC - Kevin Jackson called. 212-2128 - left vm	0.10	500.00	50.00
2/7/2014	A106 Communicate (with client) Call to client about interview	0.10	500.00	50.00
2/7/2014	A109 Appear for/attend Left office at 11:00/returned at 4:15 - City Investigations Interview of Mary Wiggins	5.30	500.00	2,650.00
2/10/2014	A108 Communicate (other external) Call from Jennifer Wiggins about Friday's interview	0.20	500.00	100.00
2/10/2014	A108 Communicate (other external) Email to Corporal Dennis Savoie about letter to eeoc	0.10	500.00	50.00

Date	Description	Hours	Rate	Total
	Previous Balance			0.00
3/3/2014	telephone call with Ms. Wiggins 2 phone calls with Ms. Wiggins regarding return to work correspondence for 3/5/2014;	0.17	500.00	85.00
3/11/2014	A106 Communicate (with client) Review client email dated 3/7 about developments in her office; called her and left her a vm saying I needed more info; sent email re: same; she called back and we discussed recent revenue examiner positions filled and how she wants to proceed	0.10	500.00	50.00
3/11/2014	A108 Communicate (other external) Letter to EEOC re additional act of retaliation/discrimination - promotion of Jessica Rowe to Field Examiner	0.10	500.00	50.00
4/10/2014	correspondence Preparation of status letter to client;	0.17	500.00	85.00
5/9/2014	A108 Communicate (other external) Return call of Kevan Jackson to set up interview time - he will call back b/c he is not sure of his schedule due to his assignment on intake	0.10	500.00	50.00
6/25/2014	A108 Communicate (other external) Draft response to EEOC summary letter	0.30	500.00	150.00
6/25/2014	Telephone conference Telephone conference with Ms. Wiggins regarding EEOC letter;	0.50	500.00	250.00
5/26/2015	A106 Communicate (with client) Call to client for 1:00 phone conference set by Christi Glasscock; got her voice message system - left a vm; sent a f/u email; she called back - discussed she is the only one in dept who hasn't been promoted and how it is affecting her retirement	0.40	500.00	200.00
6/22/2015	A108 Communicate (other external) Letter to City of Montgomery re: discrimination	0.40	500.00	200.00
7/13/2015	A106 Communicate (with client) Return client call - left vm	0.00	500.00	0.00
7/15/2015	A106 Communicate (with client) Return client call - left vm on her cell (334-207-3716); she left her daughter's number (Jennifer 334-549-0963) - tried that number next - left a vm; Jennifer called back - said her mom wanted to confirm whether Crabbe knows about what is going up - told her I didn't know.	2.00	500.00	1,000.00
10/28/2015	A106 Communicate (with client) Respond to EEOC summary letter	1.80	500.00	900.00

*- - - 18.9**Time relating to 2015 promotion
EEOC filing*

RECEIVED
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA
MARCH 22 2022

Date	Description	Hours	Rate	Total
Previous Balance				0.00
11/5/2015	A106 Communicate (with client) Call to Mary Wiggins re: email from EEOC requesting information	0.20	500.00	100.00
11/5/2015	A108 Communicate (other external) Email to Michelle Harris re: client's response to question about how to determine whether an examiner is in the field	0.10	500.00	50.00
7/12/2016	A106 Communicate (with client) Call with client about status of EEOC matter and damage calculation for Investigator	0.40	500.00	200.00
11/10/2016	A106 Communicate (with client) Call to client to discuss EEOC determination; send letter to client re: same	0.90	500.00	450.00
3/22/2017	A106 Communicate (with client) Call from client about status and concerns her health may not allow her to survive litigation	0.20	500.00	100.00
6/30/2017	L210 Pleadings Draft complaint	5.80	500.00	2,900.00
7/6/2017	A104 Review/analyze Review Doc. 4 - Notice of Assignment to US Magistrate Judge	0.10	500.00	50.00
7/12/2017	L210 Pleadings Review Doc. 5 - Service Notice	0.10	500.00	50.00
8/1/2017	A103 Draft/revise Prepare Consent to Jursidiction to US Magistrate	0.10	500.00	50.00
8/1/2017	A104 Review/analyze Doc. 7 - Conflict Disclosure Statement	0.10	500.00	50.00
8/1/2017	A104 Review/analyze Doc. 8 - Notice of Magistrate Assignment to Defendant	0.10	500.00	50.00
8/1/2017	A104 Review/analyze Review Doc. 10 - Order of Court	0.10	500.00	50.00
8/1/2017	C200 Researching Law LEXIS research for MTD	2.30	500.00	1,150.00
8/1/2017	L240 Dispositive Motions Doc. 6 - Motion to Dismiss	0.10	500.00	50.00
8/1/2017	L240 Dispositive Motions Work on response to MTD	1.80	500.00	900.00
9/14/2017	A103 Draft/revise Draft Rule 26 Report	0.50	500.00	250.00

- - - - 6.4 hours

Litigation Time

second H_{eff} $\rightarrow \dots \rightarrow \dots$

shift nothing

Date	Description	Hours	Rate	Total
	Previous Balance			0.00
9/16/2017	A104 Review/analyze Review EEOC File for 420-2015-02100	0.50	500.00	250.00
9/22/2017	A104 Review/analyze Review Doc. 15 - Answer	0.05	500.00	25.00
9/22/2017	A104 Review/analyze Review Doc. 16 - Rule 26(f) Order	0.01	500.00	5.00
9/26/2017	L310 Written Discovery Draft first interrogatories to Defendant	0.52	500.00	260.00
9/26/2017	L310 Written Discovery Draft first RPD to Defendant	0.59	500.00	295.00
9/28/2017	L230 Court Mandated Conferences Rule 26 Conference with Stephanie Smithee	0.05	500.00	25.00
10/2/2017	A104 Review/analyze Review and calendar Doc. 18 - Uniform Scheduling Order	0.38	500.00	190.00
10/3/2017	A106 Communicate (with client) Letter to client re: scheduling order and what to expect in the upcoming months re: discovery	0.20	500.00	100.00
10/5/2017	L310 Written Discovery Work on Rule 26 disclosures	1.19	500.00	595.00
10/25/2017	L310 Written Discovery Letter to Defendant re: addresses and representation of witnesses in Defendant's Rule 26 disclosures	0.10	500.00	50.00
10/25/2017	L310 Written Discovery Review Defendant's Rule 26 Initial Disclosures	0.17	500.00	85.00
10/31/2017	A104 Review/analyze Review Defendant's Initial Disclosure Documents D1-D422	1.75	500.00	875.00
11/15/2017	A107 Communicate (other outside counsel) Letter to Stephanie Smithee re: deficiencies in interrogatory answers	2.66	500.00	1,330.00
11/15/2017	L310 Written Discovery Review Defendant's Responses to Plaintiff First Set of Interrogatories	0.40	500.00	200.00
12/4/2017	A106 Communicate (with client) Review and respond to client email about defendant's documents	0.03	500.00	15.00
12/1/2018	A101 Plan and prepare for Prepare for call with Stephanie Smithee re: depositions and discovery issues; send follow-up email on call to Smithee confirming details of call	0.60	500.00	300.00

Date	Description	Hours	Rate	Total
	Previous Balance			0.00
2/1/2018	A106 Communicate (with client) Letter to client about deposition settings and how to prepare for her deposition	0.50	500.00	250.00
2/1/2018	A108 Communicate (other external) Call to Jeff Downes about giving a deposition - left a vm on his work phone number	0.10	500.00	50.00
2/2/2018	A107 Communicate (other outside counsel) email to defense counsel following up on the privacy protective order and witness contact info for deposition service	0.10	500.00	50.00
3/27/2018	A108 Communicate (other external) Draft witness subpoena letters: Charles Wilson, Cami Hacker, Carmen Douglas, and Jeff Downes	1.00	500.00	500.00
3/28/2018	A106 Communicate (with client) Let client know about rescheduling at Defendant's request	0.10	500.00	50.00
3/28/2018	A107 Communicate (other outside counsel) Review and respond to email from Stephanie Smithee re: rescheduling depositions	0.10	500.00	50.00
8/6/2018	A106 Communicate (with client) Return client call - left vm She returned call - she had questions about answering discovery	0.30	500.00	150.00
9/5/2018	L310 Written Discovery Answer Defendant's discovery requests	2.00	500.00	1,000.00
9/17/2018	A101 Plan and prepare for Prepare for deposition of Faye Comer	2.50	500.00	1,250.00
9/17/2018	L330 Depositions Deposition of Todd Strange	2.00	500.00	1,000.00
9/19/2018	L330 Depositions Attend the deposition of Ron Samms	2.00	500.00	1,000.00
9/19/2018	L330 Depositions Take the deposition of Faye Comer	3.00	500.00	1,500.00
9/21/2018	A101 Plan and prepare for Prepare for deposition of B. Crabb - pull and review documents referencing him, review notes from prior depositions to prepare follow-up questions, prepare outline	2.10	500.00	1,050.00
9/24/2018	L330 Depositions Attend deposition of Cami Hacker	0.80	500.00	400.00
9/24/2018	L330 Depositions Take deposition of Barry Crabb	2.20	500.00	1,100.00

Date	Description	Hours	Rate	Total
	Previous Balance			0.00
9/26/2018	C200 Researching Law Read Spurling v C & M Fine Pack, Inc. - case dealing with no obligation to request an accommodation in a job interview	0.40	500.00	200.00
9/28/2018	A101 Plan and prepare for Prepare for deposition of Jeff Downes	1.00	500.00	500.00
9/28/2018	L330 Depositions Deposition of Jeff Downes	1.00	500.00	500.00
10/1/2018	A107 Communicate (other outside counsel) Email to defense counsel producing document produced by Jeff Downes in response to his deposition subpoena	0.10	500.00	50.00
10/1/2018	A107 Communicate (other outside counsel) Email to defense counsel to schedule a call to Judge Capel per court's order Doc. 23.	0.10	500.00	50.00
10/3/2018	A104 Review/analyze Review Doc. 29 - Mediation Order	0.10	500.00	50.00
10/3/2018	A107 Communicate (other outside counsel) Call to Stacy Reed about scheduling mediation	0.10	500.00	50.00
10/3/2018	A108 Communicate (other external) Call to James, law clerk for Judge Capel, to schedule mediation	0.10	500.00	50.00
10/3/2018	L250 Other Written Motions and Submissions Review Doc. 217 - Motion to Withdraw of Smithee	0.10	500.00	50.00
10/23/2018	A106 Communicate (with client) Call with client to prepare for mediation	1.10	500.00	550.00
10/25/2018	A104 Review/analyze Review and calendar Doc. 33 - Order with new deadlines	0.10	500.00	50.00
11/19/2018	L330 Depositions Defend the deposition of Mary Wiggins	3.50	500.00	1,750.00
1/2/2019	L240 Dispositive Motions Review Doc. 39 - Defendant's Motion for Summary Judgment	0.30	500.00	150.00
1/8/2019	L310 Written Discovery Review Defendant City of Montgomery's Supplemental Objections and Responses to Plaintiff's Discovery	0.03	500.00	15.00
1/10/2019	L240 Dispositive Motions Work on response to defendant's motion for summary judgment	2.30	500.00	1,150.00
1/11/2019	L240 Dispositive Motions Work on response to defendant's motion for summary judgment	3.10	500.00	1,550.00

Date	Description	Hours	Rate	Total
	Previous Balance			0.00
1/14/2019	A103 Draft/review Review Doc. 40 - briefing order	0.10	500.00	50.00
1/15/2019	L240 Dispositive Motions	2.80	500.00	1,400.00
1/19/2019	L240 Dispositive Motions Work on response to defendant's motion for summary judgment	6.00	500.00	3,000.00
1/22/2019	L240 Dispositive Motions Work on MSJ Response	1.20	500.00	600.00
1/23/2019	L240 Dispositive Motions Work on MSJ Response	13.90	500.00	6,950.00
1/30/2019	A104 Review/analyze Review Doc. 44 - Defendant's MSJ Reply Brief	0.40	500.00	200.00
7/1/2019	A103 Draft/review Draft witness list/deposition designations and exhibit list	3.46	500.00	1,730.00
7/11/2019	L230 Court Mandated Conferences Status Conference before Judge Doyle	0.50	500.00	250.00
7/30/2019	A101 Plan and prepare for Mediation preparation with client	1.00	500.00	500.00
7/31/2019	L160 Settlement/Non-Binding ADR Court conducted mediation	3.00	500.00	1,500.00
2/26/2020	A103 Draft/review Draft status report on settlement	4.09	500.00	2,045.00
5/12/2020	Time Email to Def counsel about them reviewing the draft order and sending me their revisions- 4/29/20	0.10	500.00	50.00
5/12/2020	Time Finish drafting pretrial order- 4/29/20	1.00	500.00	500.00
	Amount Due	118.07		59,035.00

87.58 hours

Post Dispositive Motion / Trial Time

5.19 hours

return p1.c

return

return 8858

return 8858

return 8858

Time and Fees

for Mary Wiggins - Employment Claim - City of Montgomery

Time and Fee entries

Date	Activity	Description	Staff	Duration	Rate	Billable?	Write Off?	Status	Total
3/24/2022		Leonard Fee Declaration created, then edited and reviewed	Heather Leonard	1.30	\$500.00	True	No	-	\$650.00
3/24/2022		2 emails sent/reviewed regarding Wiggins v City of Montgomery - backpay calculation - time to discuss?	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
3/24/2022		Lost Wages Chart updated	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
3/23/2022		Motion for Attorney's Fees created, then edited	Heather Leonard	1.70	\$500.00	True	No	-	\$850.00
3/23/2022		1 email sent/reviewed regarding Wiggins v City of Montgomery - first draft of fee petition for your review	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
3/21/2022		1 email sent to client re: status update	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
3/9/2022		1 email sent/reviewed regarding Activity in Case 2:17-cv-00425-KFP Wiggins v. The City of Montgomery, Alabama (CONSENT) Order on Motion for Extension of Deadline	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
3/9/2022		1 email sent/reviewed regarding Wiggins v City of Montgomery - motion to extend deadline on backpay and fee filings	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
3/9/2022		3 emails sent/reviewed regarding Automatic reply: Wiggins v City of Montgomery - motion to extend deadline on backpay and fee filings	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
3/4/2022		1 email sent/reviewed regarding Wiggins v City of Montgomery - motion to extend deadline on backpay and fee filings	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
3/3/2022		Call to client to discuss Opinion and Order	Heather Leonard	0.50	\$500.00	True	No	-	\$250.00
3/3/2022		Review Doc. 155 - Opinion and Order	Heather Leonard	0.50	\$500.00	True	No	-	\$250.00
1/13/2022		Email to client re: status update	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/8/2021		Status update email to client	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
10/15/2021		Revie Doc. 154 - Amended Post-Trial Brief	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00

10/14/2021	Review Doc. 153 - Order	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
10/13/2021	Review Doc. 151 - Order on post trial briefing	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
10/13/2021	Review Doc. 152 - Defendant's Response to Order	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
10/7/2021	Doc. 149 - Defendant's Post-Trial Brief reviewed	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
10/6/2021	PL - Trial Brief to File reviewed/proof read	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
10/6/2021	Lost Wages Chart created, then edited	Heather Leonard	0.60	\$500.00	True	No	-	\$300.00
10/6/2021	Post-Trial Brief - Draft in Progress edited	Heather Leonard	3.70	\$500.00	True	No	-	\$1,850.00
10/6/2021	Summary - Trial Transcript Volume I reviewed	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
10/5/2021	Trial Key Evidence created, then edited	Heather Leonard	0.40	\$500.00	True	No	-	\$200.00
10/5/2021	Post-Trial Brief - Draft in Progress created, then edited	Heather Leonard	3.80	\$500.00	True	No	-	\$1,900.00
10/4/2021	1 email sent/reviewed regarding Wiggins Transcripts	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
10/4/2021	Post Trial Brief created/drafting of brief begun	Heather Leonard	2.40	\$500.00	True	No	-	\$1,200.00
10/2/2021	Services provided on 10/2/2021	Christine Poynter	0.70	\$50.00	True	No	-	\$35.00
10/1/2021	Services provided on 10/1/2021	Christine Poynter	14.30	\$50.00	True	No	-	\$715.00
9/30/2021	Services provided on 9/30/2021	Christine Poynter	10.30	\$50.00	True	No	-	\$515.00
9/29/2021	Services provided on 9/29/2021	Christine Poynter	10.20	\$50.00	True	No	-	\$510.00
9/28/2021	Services provided on 9/28/2021	Christine Poynter	12.00	\$50.00	True	No	-	\$600.00
9/17/2021	3 emails sent/reviewed regarding Wiggins	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
9/16/2021	1 email sent/reviewed regarding 17cv425 Wiggins v. City of Montgomery (Trial Transcript)	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
9/14/2021	3 emails sent/reviewed regarding Activity in Case 2:17-cv-00425-KFP Wiggins v. The City of Montgomery, Alabama (CONSENT) Transcript	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
9/3/2021	Review and approve joint motion for extension of time to file trial briefs	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
9/3/2021	Review Order Doc. 145 granting extension	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00

9/3/2021	6 emails sent/reviewed regarding Wiggins Transcript	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
8/26/2021	2 emails sent/reviewed regarding Wiggins v. City of Montgomery - trial transcript	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
8/24/2021	1 email sent/reviewed regarding Wiggins v. City of Montgomery - trial transcript	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
8/24/2021	1 email sent/reviewed regarding status update	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
8/3/2021	Review Doc. 143. - Order on Post Trial Brief	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/30/2021	1 email sent/reviewed regarding Activity in Case 2:17-cv-00425-KFP Wiggins v. The City of Montgomery, Alabama (CONSENT) Non-Jury Trial - Completed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/29/2021	Status update to client	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/29/2021	1 email sent/reviewed regarding Activity in Case 2:17-cv-00425-KFP Wiggins v. The City of Montgomery, Alabama (CONSENT) Motion for Judgment as a Matter of Law	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/29/2021	1 email sent/reviewed regarding Wiggins v. City of Montgomery - Plaintiff's Exhibit 52, page 211	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/21/2021	Review Doc. 140 - Order mooting EEOC motion to quahs	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/21/2021	Trial	Heather Leonard	7.00	\$500.00	True	No	-	\$3,500.00
7/20/2021	1 email sent/reviewed regarding Does this qualify as an "interactive process"	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/20/2021	Prepare outline to cross Urquhart	Heather Leonard	0.60	\$500.00	True	No	-	\$300.00
7/20/2021	1 email sent/reviewed regarding Wiggins v City of Montgomery - trial subpoena for the trial setting of July 19-23, 2021	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/20/2021	Comer Direct created, then edited and reviewed	Heather Leonard	3.10	\$500.00	True	No	-	\$1,550.00
7/20/2021	1 email sent/reviewed regarding [NELA-AL] : Does this qualify as an "interactive process"	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/20/2021	Zoom meeting with client to work on her testimony	Heather Leonard	1.00	\$500.00	True	No	-	\$500.00
7/20/2021	COURT Hearing - trial	Heather Leonard	6.50	\$500.00	True	No	-	\$3,250.00
7/20/2021	1 email sent/reviewed regarding [NELA Disability] : Does this qualify as an "interactive process"	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/19/2021	HL - Crabb Direct edited	Heather Leonard	1.30	\$500.00	True	No	-	\$650.00

7/19/2021	Trial	Heather Leonard	9.00	\$500.00	True	No	-	\$4,500.00
7/19/2021	1 email sent/reviewed regarding Wiggins Vs City of MGM	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/18/2021	1 email sent/reviewed regarding 17cv425 - Status Conference	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/18/2021	Work on direct exam of Faye Comer	Heather Leonard	2.10	\$500.00	True	No	-	\$1,050.00
7/18/2021	Work on direct exam of Barry Crabb	Heather Leonard	2.10	\$500.00	True	No	-	\$1,050.00
7/18/2021	1 email sent/reviewed regarding WIGGINS TRIAL - FW: 17cv425 - Status Conference	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/18/2021	PX 37- 2015 Finance Department Organizational Chart reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/18/2021	2 emails sent/reviewed regarding Wiggins v City of Montgomery - trial subpoena for the trial setting of July 19-23, 2021	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/18/2021	4 emails sent/reviewed regarding Wiggins Vs City of MGM	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
7/18/2021	HL - Crabb Direct created, then edited	Heather Leonard	0.30	\$500.00	True	No	-	\$150.00
7/18/2021	PX 38- 2016 Finance Department Organizational Chart reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/18/2021	3 emails sent/reviewed regarding Wiggins v. City of Montgomery - Cami Hacker and Carmen Douglas	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/18/2021	Trial prep meeting with client to work on her testimony	Heather Leonard	3.20	\$500.00	True	No	-	\$1,600.00
7/16/2021	2 emails sent/reviewed regarding Plaintiff's Exhibits	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/16/2021	COURT Status call with court re: whether to proceed with trial due to COVID numbers Technology Trial Run in Courtroom (Wiggins, Mary - Employment Claim - City of Montgomery) (One Church Street; Montgomery, AL (Federal Courthouse - go to the front office and ask for Tre)) attended	Heather Leonard	0.50	\$500.00	True	No	-	\$250.00
7/16/2021	Pick up Juror Disk - Be Sure to take the Juror Questionnaire Cert (it is in the computer bag) (Federal Court Montgomery) attended	Heather Leonard	1.50	\$500.00	True	No	-	\$750.00
7/16/2021	Calls with W. Mills re: bench trial and filing notice with court re same	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/16/2021	Email attachment reviewed - PX 41- June 23 2016 EEOC On-Site Investigation Notes	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00

7/16/2021	PL - Proposed Verdict Form and Special Interrogatories created, then edited and reviewed	Heather Leonard	0.80	\$500.00	True	No	-	\$400.00
7/16/2021	1 email sent/reviewed regarding Message For (7865749161:8687438) 2021-07-16 10:05AM	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/16/2021	1 email sent/reviewed regarding Mary Wiggins v. The City of Montgomery Doc. 99 - PL Notice on Bench Trial reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/16/2021	1 email sent/reviewed regarding 17cv425 - Status Conference	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/16/2021	Doc. 136 - Opposition Brief to Motion to Quash reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/16/2021	Doc. 100 - City Notice on Bench Trial reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/16/2021	1 email sent/reviewed regarding timeline Wiggins.pdf	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/16/2021	2 emails sent/reviewed regarding Wiggins Direct - 7.15.21	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/16/2021	Memo created, then edited and reviewed - Notes on Status Conference 2021.07.16	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
7/15/2021	2 emails sent/reviewed regarding Wiggins v City of Montgomery - Release from Subpoena	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/15/2021	Calling JC Jones re: trial testimony attended	Heather Leonard	0.50	\$500.00	True	No	-	\$250.00
7/15/2021	Review Doc. 130 - Mask Order	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/15/2021	1 email sent/reviewed regarding Wiggins v Montgomery - Def 7/PL 51- not bates numbered	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/15/2021	3 emails sent/reviewed regarding Mary Wiggins v. The City of Montgomery	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/15/2021	1 email sent/reviewed regarding Wiggins v City of Montgomery - trial subpoena for the trial setting of July 19-23, 2021	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/15/2021	1 email sent/reviewed regarding Defendant's Exhibit 3/Plaintiff's Exhibit 37	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/15/2021	6 emails sent/reviewed regarding Plaintiff's Exhibits	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/15/2021	Review Docs. 131-133 - Filings on EEOC's Motion to Quash	Heather Leonard	0.30	\$500.00	True	No	-	\$150.00
7/14/2021	1 email sent/reviewed regarding Wiggins v City of Montgomery - trial subpoena for the trial setting of July 19-23, 2021	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/14/2021	2 emails sent/reviewed regarding Call?	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00

7/14/2021	1 email sent/reviewed regarding Wiggins - Damages	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/14/2021	1 message sent/reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/14/2021	1 email sent/reviewed regarding Wiggins v Montgomery - Def 7/PL 51- not bates numbered	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/14/2021	1 email sent/reviewed regarding Defendant's Exhibit 3/Plaintiff's Exhibit 37	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/14/2021	Wiggins Trial Prep attended	Heather Leonard	3.00	\$500.00	True	No	-	\$1,500.00
7/13/2021	1 email sent/reviewed regarding Call?	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/13/2021	COMM Communicate - Call with C. Wilkinson re: timeline and witness order	Heather Leonard	0.60	\$500.00	True	No	-	\$300.00
7/13/2021	1 email sent/reviewed regarding WIGGINS - TIME LINE OF JOBS AND COMPLAINTS	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/13/2021	1 email sent/reviewed regarding Wiggins - Zoom witness JC JOnes	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/13/2021	1 email sent/reviewed regarding Wiggins v. City of Montgomery - Cami Hacker and Carmen Douglas	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
7/13/2021	1 email sent/reviewed regarding Wiggins v City of Montgomery - trial subpoena for the trial setting of July 19-23, 2021	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/13/2021	1 email sent/reviewed regarding Wiggins Vs City of MGM	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/13/2021	1 email sent/reviewed regarding Mary Wiggins v. The City of Montgomery	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/13/2021	1 email sent/reviewed regarding Message For (7865749161:8674024) 2021-07-13 11:21AM	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/12/2021	1 email sent/reviewed regarding Wiggins Direct - 7.12.21	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/12/2021	2 emails sent/reviewed regarding Activity in Case 2:17-cv-00425-KFP Wiggins v. The City of Montgomery, Alabama (CONSENT) Order on Motion for Miscellaneous Relief	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
7/12/2021	2 emails sent/reviewed regarding Your Jul-18-2021 Confirmation #52813231	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/8/2021	2 emails sent/reviewed regarding Message For (7865749161:8655653) 2021-07-08 03:37PM	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/8/2021	2 emails sent/reviewed regarding Wiggins	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/8/2021	Doc. 127 Notice of Jury List and Questionnaire Certification reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00

7/8/2021	4 emails sent/reviewed regarding Wiggins v City of Montgomery - trial subpoenas for Comer, Rowe, Urquhart, and Vines	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/8/2021	Trial Preparation Meeting with Mary Wiggins (Mary Wiggins - Employment Claim - City of Montgomery) (Heather Leonard PC (2105 Devereux Cir Ste 111, Vestavia Hills, AL 35243)) attended	Heather Leonard	3.40	\$500.00	True	No	-	\$1,700.00
7/8/2021	1 email sent/reviewed regarding Message For (7865749161:8653393) 2021-07-08 09:14AM	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/8/2021	1 email sent/reviewed regarding Vines returned call	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/7/2021	Pretrial Conference (Courtroom 5A (Judge Pate) - Federal Court Montgomery) attended	Heather Leonard	1.00	\$500.00	True	No	-	\$500.00
7/7/2021	1 email sent/reviewed regarding Wiggins v City of Montgomery	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/6/2021	1 email sent/reviewed regarding Wiggins v City of Montgomery	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/6/2021	1 email sent/reviewed regarding WIGGINS DIRECT - plaintiff	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
7/6/2021	Wiggins Direct - HL edits with track changes created, then edited	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
7/6/2021	5 emails sent/reviewed regarding Wiggins v City of Montgomery - motion to permit Jones and/or EEOC custodian of records to appear via Zoom/video conference	Heather Leonard	0.30	\$500.00	True	No	-	\$150.00
7/6/2021	3 emails sent/reviewed regarding Wiggins Vs City of MGM	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/6/2021	1 email sent/reviewed regarding Wiggins v City of Montgomery - trial subpoenas for Carmen Douglas and Cami Hacker	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/6/2021	PL - Motion to Appear Via Zoom - JC Jones created, then edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Rowe, Pamela - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Jones, JC - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Hacker, Cami - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Douglas, Carmen - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00

7/5/2021	Crabb, Barry - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	3 messages sent/reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	1 email sent/reviewed regarding Wiggins v City of Montgomery - Plaintiff's Trial Exhibits	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Sams, Ron - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Doc. 124 - ORDER setting Jury Trial for 7.19.2021 reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Trial Prep - put together trial notebook for pretrial hearing on Wed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Trial Prep - review Plaintiff's proposed trial exhibits to make sure redactions have been made	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
7/5/2021	Doc. 86 - Def Proposed Jury Charges reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Comer, Faye - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Strange, Todd - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	1 email sent/reviewed regarding Wiggins v City of Montgomery - trial subpoenas for Comer, Rowe, Urquhart, and Vines	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Vines, Patrick - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Letter - Sams re trial subpoena drafted	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	PL - Motion to Appear Via Zoom - JC Jones and EEOC Custodian of Records created, then edited	Heather Leonard	0.30	\$500.00	True	No	-	\$150.00
7/5/2021	1 email sent/reviewed regarding Wiggins v City of Montgomery - motion to permit Jones and/or EEOC custodian of records to appear via Zoom/video conference	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Urquhart, Cheryl - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	1 email sent/reviewed regarding Wiggins v City of Montgomery - trial subpoena for trial term of July 19-23	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Crabb 2021.07.06 - Re trial subpoena created, then edited and reviewed	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00

7/5/2021	Letter - Strange 2021.07.06 created, then edited	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
7/5/2021	1 email sent/reviewed regarding Wiggins v City of Montgomery - trial subpoena for the trial setting of July 19-23, 2021	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Letter - Douglas and Hacker - 2021.07.06 created, then edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	1 email sent/reviewed regarding Wiggins v City of Montgomery - trial subpoenas for Carmen Douglas and Cami Hacker	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Letter - Defense Counsel re ciity employee subpoenas - 2020.07.06 created	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	1 email sent/reviewed regarding Wiggins v City of Montgomery - trial subpoena for the July 19-23 trial term	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/5/2021	Sams 2021.07.06 Re trial subpoena created, then reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/24/2021	3 emails sent/reviewed regarding Wiggins v. City of Montgomery - trial prep meeting and questions to send to Mary	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/24/2021	Trial Prep Call with client	Heather Leonard	0.50	\$500.00	True	No	-	\$250.00
6/21/2021	2 emails sent/reviewed regarding Trial continued	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/8/2021	1 email sent/reviewed regarding Message For (7865749161:8534663) 2021-06-08 12:32PM	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
4/19/2021	1 email sent/reviewed regarding Trial continued	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
4/7/2021	Review Doc. 124 - Order setting trial for July	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
3/25/2021	2 emails sent/reviewed regarding Wiggins v. City	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
3/22/2021	1 email sent/reviewed regarding Wiggins v City.of Montgomery - joint exhibit list for everyone's review	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
3/19/2021	COMM Communicate - call with Wallace Mills re settlement/mediation	Heather Leonard	0.30	\$500.00	True	No	-	\$150.00
3/19/2021	2 emails sent/reviewed regarding Wiggins v City of Montgomery - joint exhibit list for everyone's review	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
3/9/2021	Review Doc. 122 - Order	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/23/2020	Review Doc. 121 - Order on Motions in Limine	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/21/2020	3 emails sent/reviewed regarding Trial continued	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00

12/16/2020	1 email sent/reviewed regarding Trial continued	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/10/2020	1 email sent/reviewed regarding Message For (7865749161:7795295) 2020-11-23 04:00PM	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/8/2020	1 email sent/reviewed regarding Zoom Invite for 12/8/20 10:00 am Status Conference before Judge Pate	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/7/2020	1 email sent/reviewed regarding Trial continued	Heather Leonard	0.10	\$450.00	True	No	-	\$45.00
12/4/2020	1 email sent/reviewed regarding Activity in Case 2:17-cv-00425-KFP Wiggins v. The City of Montgomery, Alabama (CONSENT) Order on Motion for Miscellaneous Relief	Heather Leonard	0.10	\$450.00	True	No	-	\$45.00
12/3/2020	PL - Motion to Appear Via Zoom - JC Jones edited	Heather Leonard	0.30	\$500.00	True	No	-	\$150.00
12/2/2020	1 email sent/reviewed regarding Please type the plaintiff's exhibits into the first column of the attached chart and email back to me	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/2/2020	1 email sent/reviewed regarding Wiggins v City of Montgomery - trial subpoenas for Cami Hacker and Carmen Douglas	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/2/2020	1 email sent/reviewed regarding Wiggins	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/2/2020	1 email sent/reviewed regarding Wiggins - JC Jones	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/2/2020	Exhibit Chart for Trial created, then edited and reviewed	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
12/2/2020	1 email sent/reviewed regarding Mary Wiggins v. The City of Montgomery	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/2/2020	1 email sent/reviewed regarding Wiggins PL Trial Exhibit Chart	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/2/2020	1 email sent/reviewed regarding Wiggins - DIRECT - SAMS	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/2/2020	2 emails sent/reviewed regarding Wiggins - call to JC Jones	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/2/2020	5 emails sent/reviewed regarding DIRECT - DOUGLAS	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
12/2/2020	AA - Trial exhibit list- Plaintiff edited	Heather Leonard	0.30	\$500.00	True	No	-	\$150.00
12/2/2020	2 emails sent/reviewed regarding Wiggins v City of Montgomery - Trial continued	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/2/2020	1 email sent/reviewed regarding Trial continued	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
12/2/2020	4 emails sent/reviewed regarding Wiggins v City of Montgomery - trial is being continued	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00

12/2/2020		1 email sent/reviewed regarding Wiggins v City of Montgomery - Exhibit Chart for use at trial	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/2/2020	REV	Review - Doc. 118 - Order continuing trial	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020		Comer, Faye - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020		Letter - Douglas and Hacker - 2020.12.01 created, then edited and reviewed	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
12/1/2020		2 emails sent/reviewed regarding Wiggins v City of Montgomery - witness checks I need you to write	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020		Hacker, Cami - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020		Douglas, Carmen - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020		Rowe, Pamela - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020		Letter - Strange 2020.12.01 created, then edited and reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020		Strange, Todd - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020		Letter - Crabb - 2020.12.01 created, then edited and reviewed	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
12/1/2020		Sams, Ron - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020	COMM	Communicate - call with W. Mills re: motion for JC Jones to appear at trial via zoom	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020		Letter - Sams - 2020.12.01 created, then edited and reviewed	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
12/1/2020		Urquhart, Cheryl - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020		1 email sent/reviewed regarding Wiggins - call to JC Jones	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020		Letter - Defense Counsel re ciity employee subpoenas - 2020.12.01 created, then edited and reviewed	Heather Leonard	0.30	\$500.00	True	No	-	\$150.00
12/1/2020		Vines, Patrick - Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00

12/1/2020	PL - Motion to Appear Via Zoom - JC Jones created, then edited	Heather Leonard	1.30	\$500.00	True	No	-	\$650.00
12/1/2020	4 emails sent/reviewed regarding Wiggins v City of Montgomery - trial subpoena for Barry Crabb	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020	2 emails sent/reviewed regarding DIRECT - HACKER	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020	1 email sent/reviewed regarding Wiggins v City of Montgomery - trial subpoena for Ron Sams	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020	1 email sent/reviewed regarding Wiggins v City of Montgomery - trial subpoenas for Cami Hacker and Carmen Douglas	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020	1 email sent/reviewed regarding Wiggins v City of Montgomery - motion to have JC Jones appear at trial via Zoom	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020	1 email sent/reviewed regarding Wiggins v City of Montgomery - trial subpoena to Todd Strange	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
12/1/2020	3 emails sent/reviewed regarding Wiggins v City of Montgomery - trial subpoenas for city employees	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/30/2020	1 email sent/reviewed regarding Depo Summary HACKER	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/30/2020	4 emails sent/reviewed regarding Wiggins - Deposition Transcripts - Carmen Douglas and Charles Wilson	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/30/2020	4 emails sent/reviewed regarding Court Clothing Selection	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/30/2020	PL - Trial Exhibit List reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/30/2020	1 email sent/reviewed regarding Wiggins v City of Montgomery - Exhibit List	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/25/2020	1 email sent/reviewed regarding Revenue Office Visit & Drawing	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/24/2020	1 email sent/reviewed regarding Wiggins v City of Montgomery	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/23/2020	1 email sent/reviewed regarding Mom's court attire	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
11/23/2020	2 emails sent/reviewed regarding Wiggins - can you please provide JC Jones's phone number	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/23/2020	Finalize and file doc. 116 - Joint Notice on MIL	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/23/2020	2 emails sent/reviewed regarding Wiggins v City of Montgomery - joint exhibit list for everyone's review	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/23/2020	3 emails sent/reviewed regarding Wiggins v. City	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00

11/20/2020	1 email sent/reviewed regarding Wiggins v. City of Montgomery - can we confer Thursday or Friday re: Doc. 110?	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/20/2020	Wiggins Exhibit Chart - For Joint Exhibit List created, then edited and reviewed	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
11/20/2020	Pretrial Order - 2020.11.20 created, then edited	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
11/20/2020	Joint - notice to the court regarding nay pending motions in limine that have been resolved by the parties' stipulations created, then edited and reviewed	Heather Leonard	0.60	\$500.00	True	No	-	\$300.00
11/20/2020	1 email sent/reviewed regarding Wiggins v City of Montgomery - joint exhibit list for everyone's review	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/20/2020	Wiggins Exhibit Chart - Sent to all Parties created, then edited and reviewed	Heather Leonard	0.30	\$500.00	True	No	-	\$150.00
11/20/2020	Joint Exhibit List created, then edited and reviewed	Heather Leonard	0.60	\$500.00	True	No	-	\$300.00
11/20/2020	1 email sent/reviewed regarding Wiggins - can you please provide JC Jones's phone number	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/20/2020	Pretrial Order - Sent to the Court 2020.11.20 created, then edited and reviewed	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
11/20/2020	6 emails sent/reviewed regarding Wiggins v City of Montgomery - chart of overlapping exhibits	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
11/20/2020	3 emails sent/reviewed regarding Wiggins v City of Montgomery - chart of overlapping exhibits	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/20/2020	3 emails sent/reviewed regarding 2:17-cv-425Wiggins v City of Montgomery - pretrial order	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/20/2020	Email attachment reviewed - Pretrial Order - 2020.11.20	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/20/2020	2 emails sent/reviewed regarding Wiggins v City of Montgomery - joint exhibit list for everyone's review	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/20/2020	3 emails sent/reviewed regarding Wiggins v. City of Montgomery (Civil Action 2:17-cv-00425-SMD) - need to subpoena Investigator Michelle Harris or a Custodian of Records for Trial Testimony	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
11/19/2020	8 emails sent/reviewed regarding Wiggins - can you please provide JC Jones's phone number	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
11/18/2020	1 email sent/reviewed regarding Wiggins vs City of MGM	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00

11/18/2020	Mary Wiggins Trial Prep Meeting (Heather Leonard PC (2105 Devereux Cir Ste 111, Vestavia Hills, AL 35243)) attended	Heather Leonard	3.00	\$500.00	True	No	-	\$1,500.00	
11/17/2020	1 email sent/reviewed regarding Wiggins vs City of MGM	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00	
11/17/2020	1 email sent/reviewed regarding Confirming our trial prep meeting for tomorrow at 10:30 at Heather's Office	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00	
11/17/2020	2 emails sent/reviewed regarding Please type the plaintiff's exhibits into the first column of the attached chart and email back to me	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00	
11/16/2020	Zoom meet and confer with defendant re: exhibits, motions in limine, stipulations, and pretrial order	Heather Leonard	0.50	\$500.00	True	No	-	\$250.00	
11/16/2020	Wiggins v City of Montgomery - Conference call via Zoom to confirm the pretrial order, work on a joint exhibit list, discuss motions in limine/stipulations (https://us02web.zoom.us/j/88021089893?pwd=Qk5hcjlSUVnYjVHWE1GekkvVGoXZz09&from=addon) attended	Heather Leonard	1.00	\$500.00	True	No	-	\$500.00	
11/16/2020	2 emails sent/reviewed regarding Wiggins vs City of MGM	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00	
11/13/2020	COMM	Communicate - call with client re: status and trial prep	Heather Leonard	0.40	\$500.00	True	No	-	\$200.00
11/12/2020	REV	Review - Doc. 112 - Order Setting Trial	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/12/2020	PL -Motion to Be Excused from Pretrial Conference created, then edited	Heather Leonard	0.70	\$500.00	True	No	-	\$350.00	
11/12/2020	Wit 2020.11.12 - Letter to Barry Crabb re trial subpoena coming created, then edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00	
11/12/2020	Wit 2020.11.12 - Letter to J.C. Jones re trial subpoena created, then edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00	
11/12/2020	Wit 2020.11.12 - Letter to Todd Strange re trial subpoena created, then edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00	
11/12/2020	Wit 2020.11.12 - Letter to Ron Sams re trial subpoenas created, then edited	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00	
11/12/2020	1 email sent/reviewed regarding Activity in Case 2:17-cv-00425-KFP Wiggins v. The City of Montgomery, Alabama (CONSENT) Order on Motion for Miscellaneous Relief	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00	
11/12/2020	Client 2020.11.12 - Re trial setting created, then edited and reviewed	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00	
11/9/2020	PL -Notice to Court on Conflicts created, then edited	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00	

11/9/2020		2 emails sent/reviewed regarding Wiggins v. City of Montgomery - can we confer Thursday or Friday re: Doc. 110?	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/4/2020	REV	Review - Doc. 110 - Order	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/3/2020	REV	Review - Doc. 108 - NOA for Brittney F. Jones	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
11/2/2020		Pretrial Conference (Federal Court Montgomery) attended	Heather Leonard	1.50	\$500.00	True	No	-	\$750.00
10/22/2020		PL -Notice of Conflict created, then edited	Heather Leonard	0.40	\$500.00	True	No	-	\$200.00
10/21/2020		Doc. 106 - Order Moving Trial reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
9/30/2020		2 messages sent/reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
9/29/2020		6 messages sent/reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
9/17/2020		1 email sent/reviewed regarding Wiggins v City of Montgomery	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
9/17/2020	COMM	Communicate - letter to client re: new trial date	Heather Leonard	0.40	\$500.00	True	No	-	\$200.00
9/15/2020	COURT	Hearing - Status Conference	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
9/14/2020		1 email sent/reviewed regarding 2:17cv425-KFP Wiggins vs. The City of Montgomery, AL., Zoom Status Conference Invite	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
9/14/2020		Doc. 103 - Order Seting zoom status conference reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
9/14/2020		1 email sent/reviewed regarding Wiggins v City of Montgomery - Trial Continued	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
9/12/2020	REV	Review - Doc. 107 - Notice of Conflict	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
9/11/2020		1 email sent/reviewed regarding Wiggins v City of Montgomery - Trial Continued	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
8/7/2020		1 email sent/reviewed regarding Activity in Case 2:17-cv-00425-SMD Wiggins v. The City of Montgomery, Alabama (CONSENT) Order	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
8/6/2020		1 email sent/reviewed regarding Activity in Case 2:17-cv-00425-SMD Wiggins v. The City of Montgomery, Alabama (CONSENT) Order	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
8/3/2020	REV	Review - Doc. 100 - City Notice on Bench Trial	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
8/3/2020		1 email sent/reviewed regarding Wiggins v City of Montgomery - Trial Continued	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00

7/31/2020		Review Doc. 100 - City's Notice on Bench Trial	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/29/2020		3 emails sent/reviewed regarding Brookdale - witness and exhibit lists	Heather Leonard	0.40	\$500.00	True	No	-	\$200.00
7/29/2020		Email attachment reviewed - PL - Witness List and Deposition Designations	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/29/2020		Zoom Conference with Court re: 17cv425 Wiggins v Montgomery (Zoom) attended	Heather Leonard	0.50	\$500.00	True	No	-	\$250.00
7/29/2020		PL -Notice to Court created, then edited	Heather Leonard	0.50	\$500.00	True	No	-	\$250.00
7/27/2020		1 email sent/reviewed regarding 2:17cv425-SMD Wiggins v. The City of Montgomery	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/27/2020	REV	Review - Doc. 97 - Order Setting Status Conference	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
7/24/2020		1 email sent/reviewed regarding 17cv425 Wiggins v Montgomery	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/26/2020		1 email sent/reviewed regarding Activity in Case 2:17-cv-00425-SMD Wiggins v. The City of Montgomery, Alabama (CONSENT) Order	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/23/2020	REV	Review -Doc. 94 - Def Response to PL Mtn in Limine	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/22/2020		PL - Response to Motion in Limine created, then edited and reviewed	Heather Leonard	0.50	\$500.00	True	No	-	\$250.00
6/22/2020		Doc. 85 - Def Motion in Limine reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/17/2020		1 email sent/reviewed regarding Research	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/17/2020		1 email sent/reviewed regarding WIGGINS - DEPO INVOICES	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/17/2020		1 email sent/reviewed regarding Jury Instructions - Wiggins	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/17/2020		2 emails sent/reviewed regarding City's Exhibit List	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/15/2020		Doc. 87-1 - Def Response to Obj to Wit List - Ex A - PL Initial Disclosures reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/15/2020		PL - MIL created, then edited	Heather Leonard	0.70	\$500.00	True	No	-	\$350.00
6/15/2020		PL - Jury Charges reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/15/2020		Doc. 77 - PL Obj to Def Ex List reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/15/2020		Doc. 15 - Answer reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/15/2020		Doc. 70 - PL Exhibit List reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00

6/15/2020	1 email sent/reviewed regarding Jury Instructions - Wiggins	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/15/2020	Doc. 76- PL Witness List Amended reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/15/2020	PL - Response to Objectoins to Deposition Designations created, then edited and reviewed	Heather Leonard	0.50	\$500.00	True	No	-	\$250.00
6/15/2020	Doc. 84 - Def Response to PL Obj to Ex List reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/15/2020	Doc. 85 - Def Motion in Limine reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/15/2020	Doc. 86 - Def Proposed Jury Charges reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/15/2020	Doc. 87 - Def Response to Obj to Wit List reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/15/2020	PL - Response to Objectoins to Exhibits created, then edited	Heather Leonard	2.40	\$500.00	True	No	-	\$1,200.00
6/15/2020	Doc. 81- PL Obj to Def Witness List reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/12/2020	PL - Witness List and Deposition Designations reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/12/2020	Matter review	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/9/2020	1 email sent/reviewed regarding Activity in Case 2:17-cv-00425-SMD Wiggins v. The City of Montgomery, Alabama (CONSENT) Objection to	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/8/2020	Doc. 78 - Order Continuing Trial reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/8/2020	Doc. 80 - Objection to Witness List and Depo Designations reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/8/2020	REV Revie Defendant's Objections to Plaintiff's Exhibit List (Doc. 79)	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
6/8/2020	Doc. 80-1 - Objection to Witness List and Depo Designations - Exhibit A - Plaintiff's Designated Excerpts reviewed	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
6/8/2020	1 email sent/reviewed regarding Trial Continued to August 24	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/5/2020	1 email sent/reviewed regarding Deadlines	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/4/2020	Doc. 53 - MSJ Opinion reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/4/2020	2 emails sent/reviewed regarding Wiggins v City of Montgomery - stipulation of exhibits	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/4/2020	PL - Objections to Defendant's Exhibit List reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00

6/4/2020	Doc. 76- PL Witness List Amended reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/3/2020	1 email sent/reviewed regarding Wiggins v Montgomery - supplement to Plaintiffs Rule 26 Disclosures	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/3/2020	1 email sent/reviewed regarding Anyone know anything about Judge Brasher's trial last week	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/3/2020	1 email sent/reviewed regarding [NELA-AL] : Anyone know anything about Judge Brasher's trial last week	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/3/2020	2 emails sent/reviewed regarding Lee Owen	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/3/2020	1 email sent/reviewed regarding Wiggins v City of Montgomery - objections to Defendant's witness list	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/3/2020	PL - Objections to Defendant's Exhibit List created, then edited and reviewed	Heather Leonard	1.90	\$500.00	True	No	-	\$950.00
6/3/2020	1 email sent/reviewed regarding Wiggins v City of Montgomery - stipulation of exhibits	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
6/3/2020	2 emails sent/reviewed regarding Wiggins v. City	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/2/2020	Heather Calling Sonya to Discuss Judge Marks/Judge Doyle/July 6 trial (Phone) attended	Heather Leonard	0.50	\$500.00	True	No	-	\$250.00
6/2/2020	3 emails sent/reviewed regarding Process Servers in Montgomery	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/2/2020	1 email sent/reviewed regarding Lee Owen	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
6/1/2020	Pretrial Order - for the court and approved by all parties reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/26/2020	REV Review -Def Exhibit List (Doc. 75) and compare to ours	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
5/26/2020	1 email sent/reviewed regarding When do you need the Wiggins research- it's pretty long	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/26/2020	PL - Witness List and Deposition Designations edited and reviewed	Heather Leonard	0.80	\$500.00	True	No	-	\$400.00
5/26/2020	REV Review -Doc. 74 - Defendant's Witness List	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/21/2020	4 messages sent/reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/21/2020	Doc. 73 - Objection to Motion to Lead reviewed	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
5/21/2020	1 email sent/reviewed regarding Wiggins v City of Montgomery - emailing judge about the status of jury trials	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00

5/20/2020	AL_SCAdminOrderNo7 created	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/20/2020	11 emails sent/reviewed regarding Wiggins v City of Montgomery - emailing judge about the status of jury trials	Heather Leonard	0.60	\$500.00	True	No	-	\$300.00
5/20/2020	1 email sent/reviewed regarding Wiggins v City of Montgomery - trial witnesses	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/20/2020	5 emails sent/reviewed regarding 2:17-cv-00425-SMD - Wiggins v City of Montgomery - status of jury trials	Heather Leonard	0.30	\$500.00	True	No	-	\$150.00
5/20/2020	Notice of Appearance created	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/20/2020	7 messages sent/reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/19/2020	1 email sent/reviewed regarding Wiggins v City of Montgomery - Plaintiff's Motion to Lead Witnesses	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/19/2020	1 message sent/reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/18/2020	2 emails sent/reviewed regarding Wiggins v City of Montgomery - Plaintiff's Motion to Lead Witnesses	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/18/2020	2 emails sent/reviewed regarding Activity in Case 2:17-cv-00425-SMD Wiggins v. The City of Montgomery, Alabama (CONSENT) Evidentiary Submission	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/18/2020	1 email sent/reviewed regarding Wiggins - Stipulation of Exhibits	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/13/2020	1 message sent/reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/12/2020	1 email sent/reviewed regarding Activity in Case 2:17-cv-00425-SMD Wiggins v. The City of Montgomery, Alabama (CONSENT) Exhibit List	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/12/2020	Email attachment reviewed - PL MTN DIRECT ADVERSE WITNESSES - HNL Review	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/12/2020	1 email sent/reviewed regarding Wiggins v City of Montgomery - Plaintiff's Motion to Lead Witnesses	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/12/2020	3 emails sent/reviewed regarding Wiggins v City of Montgomery - trial witnesses	Heather Leonard	0.30	\$500.00	True	No	-	\$150.00
5/12/2020	2 emails sent/reviewed regarding Wiggins v City of Montgomery - motion to lead	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/12/2020	1 email sent/reviewed regarding Activity in Case 2:17-cv-00425-SMD Wiggins v. The City of Montgomery, Alabama (CONSENT) Pretrial Conference	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00

5/11/2020		PL - Witness List and Deposition Designations reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/11/2020		DEF - Initial Disclosures - Wiggins - 2017.10.23 reviewed	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/11/2020		PL -Trial Exhibit List created, then edited	Heather Leonard	2.50	\$500.00	True	No	-	\$1,250.00
5/11/2020	COMM	Communicate - exchange emails with CFW re: motion to lead on direct	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
5/11/2020		PL MTN DIRECT ADVERSE WITNESSES - HNL Review created, then edited and reviewed	Heather Leonard	0.60	\$500.00	True	No	-	\$300.00
5/11/2020	COMM	Communicate - email to defendants about which witnesses they can produce absent a subpoena	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/11/2020		Pretrial Order - for the court and approved by all parties reviewed	Heather Leonard	0.20	\$500.00	True	No	-	\$100.00
5/11/2020		PL - Witness List and Deposition Designations created, then edited	Heather Leonard	0.90	\$500.00	True	No	-	\$450.00
5/7/2020	REV	Review - Doc. 68 - Order Setting Final Pretrial Conference	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/7/2020		1 email sent/reviewed regarding Activity in Case 2:17-cv-00425-SMD Wiggins v. The City of Montgomery, Alabama (CONSENT) Order	Heather Leonard	0.10	\$500.00	True	No	-	\$50.00
5/7/2020	COMM	Communicate	Heather Leonard	0.50	\$500.00	True	No	-	\$250.00
5/7/2020		Pretrial Conference (Zoom) attended	Heather Leonard	0.50	\$500.00	True	No	-	\$250.00
5/7/2020		Wiggins v City of Montgomery - pretrial conference (Zoom) attended	Heather Leonard	0.50	\$500.00	True	No	-	\$250.00
5/4/2020	COMM	Communicate	Heather Leonard	0.50	\$500.00	True	No	-	\$250.00
5/1/2020	REV	Review Defendant's revisions to pretrial order	Heather Leonard	0.30	\$500.00	True	No	-	\$150.00
Total - Write offs				0.00					\$0.00
Total - Unbillable				0.00					\$0.00
Total - Billable				0.00					\$65,765.00
Total				174.30					\$65,765.00

Expenses

for Mary Wiggins - Employment Claim - City of Montgomery



Expense entries

Date	Activity	Description	Staff	Quantity	Price	Billable?	Write Off	Total
3/3/2022	COPY	Billable Copies-Order, opinion and memorandum	Christine Poynter	46	\$0.25	True	No	- \$11.50
10/18/2021	COPY	Billable Copies - Doc. 154 - Amended Post Trial Brief for the City of Montgomery	Christine Poynter	28	\$0.25	True	No	- \$7.00
10/14/2021	COPY	Billable Copies - Doc. 152 - Response to Order re [151] Order, by The City of Montgomery, Alabama. (Mills, Wallace)	Christine Poynter	3	\$0.25	True	No	- \$0.75
10/12/2021	COPY	Billable Copies - Doc. 149 - Trial Brief by The City of Montgomery	Christine Poynter	27	\$0.25	True	No	- \$6.75
10/12/2021	COPY	Billable Copies - Doc. 150 - Trial Brief of Mary Wiggins	Christine Poynter	47	\$0.25	True	No	- \$11.75
9/29/2021	COPY	Billable Copies - Print Volume III trial transcript for summarizing	Christine Poynter	195	\$0.25	True	No	- \$48.75
9/17/2021		Trial Transcript	Heather Leonard	1	\$1496.95	True	No	- \$1,496.95
7/26/2021	COPY	Billable Copies - Doc. 141 - Juror Questionnaire	Christine Poynter	4	\$0.25	True	No	- \$1.00
7/22/2021		Hotel expense for trial	Heather Leonard	2	\$817.29	True	No	- \$1,634.58
7/20/2021	COPY	Billable Copies - Doc. 139 ORDER it is ORDERED that the bench trial of this matter will begin on	Christine Poynter	1	\$0.25	True	No	- \$0.25
7/20/2021	COPY	Billable Copies - Doc. 138 Bench Trial Status Report	Christine Poynter	1	\$0.25	True	No	- \$0.25
7/20/2021	COPY	Billable Copies - Doc. 128 and Doc. 129 - Orders	Christine Poynter	9	\$0.25	True	No	- \$2.25
7/19/2021		Dinner at trial for Heather and Cynthia	Heather Leonard	1	\$54.98	True	No	- \$54.98
7/15/2021	COPY	Billable Copies - Trial exhibits x 3 (Notebooks for Court, Witness, Counsel)	Jim Leonard	2804	\$0.25	True	No	- \$701.00
7/8/2021	COPY	Billable Copies - Doc. 127 - 127-1 Jury Questionnaire	Christine Poynter	3	\$0.25	True	No	- \$0.75
7/7/2021	COPY	Billable Copies Doc. 125 MOTION Permit Witness J.C. Jones to Appear at Trial Via Zoom and/or Video Conference	Christine Poynter	6	\$0.25	True	No	- \$1.50
7/6/2021		Witness Fee Checks - Douglas and Hacker	Heather Leonard	2	\$40.92	True	No	- \$81.84

7/6/2021	COPY	Billable Copies - letter to Bobby Segal and trial subpoenas for Hacker and Douglas	Heather Leonard	7	\$0.25	True	No	-	\$1.75
7/6/2021		Witness Fee Check - Todd Strange	Heather Leonard	1	\$47.48	True	No	-	\$47.48
7/6/2021	COPY	Billable Copies - witness letter and trial subpoena to Ron Samms	Heather Leonard	4	\$0.25	True	No	-	\$1.00
7/6/2021	COPY	Billable Copies - witness letter and trial subpoena for Barry Crabb	Heather Leonard	4	\$0.25	True	No	-	\$1.00
7/6/2021	COPY	Billable Copies - Witness letter and trial subpoena to Todd Strange	Heather Leonard	4	\$0.25	True	No	-	\$1.00
7/6/2021		Witness Fee Check - Barry Crabb	Heather Leonard	1	\$47.13	True	No	-	\$47.13
7/5/2021	COPY	Billable Copies - letter and trial subpoenas to defense counsel for Rowe, Vines, Urquhart, and Comer	Heather Leonard	13	\$0.25	True	No	-	\$3.25
3/29/2021	COPY	Billable Copies - Doc. 123 Response to Order re [122] Order,,, Set Deadlines,, by The City of	Christine Poynter	3	\$0.25	True	No	-	\$0.75
3/9/2021	COPY	Billable copies - Doc. 122 - Order	Christine Poynter	2	\$0.25	True	No	-	\$0.50
1/8/2021	PACER	PACER Billing - December	Heather Leonard	28	\$0.10	True	No	-	\$2.80
1/4/2021	COPY	Billable Copies - Doc. 121 - ORDER on Plaintiff's Motion and Motions in Limine	Christine Poynter	10	\$0.25	True	No	-	\$2.50
12/2/2020	COPY	Billable Copies - Consent MOTION to Permit JC Jones to Testify	Christine Poynter	6	\$0.25	True	No	-	\$1.50
12/2/2020	COPY	Billable Copies - Doc. 118 - Order continuing trial	Heather Leonard	2	\$0.25	True	No	-	\$0.50
12/1/2020		Postage	Jim Leonard	4	\$6.90	True	No	-	\$27.60
12/1/2020	COPY	Billable Copies - letter with trial subpoenas to defense counsel	Heather Leonard	26	\$0.25	True	No	-	\$6.50
12/1/2020		Certified Mail for Trial Subpoenas	Heather Leonard	3	\$7.08	True	No	-	\$21.24
12/1/2020		Witness Fee Checks	Heather Leonard	1	\$225.65	True	No	-	\$225.65
11/30/2020	COPY	Billable Copies Doc. 115 and Doc. 116 Joint Exhibit List and Order	Christine Poynter	12	\$0.25	True	No	-	\$3.00
11/16/2020	COPY	Billable Copies- Doc. 113 Motion to Excuse Heather Leonard from Pretrial Conference	Christine Poynter	3	\$0.25	True	No	-	\$0.75
11/12/2020	COPY	Billable Copies Doc. 112 - Order Setting Trial	Heather Leonard	1	\$0.25	True	No	-	\$0.25
11/10/2020	COPY	Billable Copies - Doc 111 - Notice by Wiggins	Christine Poynter	2	\$0.25	True	No	-	\$0.50
11/4/2020	COPY	Billable Copies - Doc. 110 - Order	Heather Leonard	2	\$0.25	True	No	-	\$0.50

11/3/2020		Meal - Vintage Cafe	Heather Leonard	10.5	\$0.00	True	No	-	\$0.00
11/3/2020	COPY	Billable Copies - Doc. 108 - NOA for Brittney F. Jones	Heather Leonard	2	\$0.25	True	No	-	\$0.50
10/21/2020	PACER	PACER Billing	Heather Leonard	20	\$0.10	True	No	-	\$2.00
9/17/2020		Postage - Billable Copies - letter to client re: new trial date	Heather Leonard	1	\$0.55	True	No	-	\$0.55
9/17/2020	COPY	Billable Copies - letter to client re: new trial date	Heather Leonard	1	\$0.25	True	No	-	\$0.25
9/12/2020	COPY	Billable Copies - Doc. 107 - Notice of Conflict	Heather Leonard	5	\$0.25	True	No	-	\$1.25
8/3/2020	COPY	Billable Copies -Doc. 99 - PL Notice on Bench Trial	Heather Leonard	5	\$0.25	True	No	-	\$1.25
8/3/2020	COPY	Billable Copies - Doc. 100 - City Notice on Bench Trial	Heather Leonard	2	\$0.25	True	No	-	\$0.50
7/27/2020	COPY	Billable Copies - Doc. 97 - Order Setting Status Conference	Heather Leonard	1	\$0.25	True	No	-	\$0.25
7/6/2020		PACER - June usage billed to case	Heather Leonard	89	\$0.10	True	No	-	\$8.90
6/23/2020	COPY	Billable Copies - Doc. 95 - PL Response to Def MIL	Heather Leonard	13	\$0.25	True	No	-	\$3.25
6/23/2020	COPY	Billable Copies - Doc. 94 - Def Response to PL Mtn in Limine	Heather Leonard	5	\$0.25	True	No	-	\$1.25
6/17/2020	COPY	Billable Copies - Doc. 93 - PL Exs to Which Defendant Objected	Heather Leonard	934	\$0.25	True	No	-	\$233.50
6/15/2020	COPY	Billable Copies - Doc. 82 - PL Motion in Limine	Heather Leonard	10	\$0.25	True	No	-	\$2.50
6/15/2020	COPY	Billable Copies - Doc. 84 - Def Response to PL Obj to Def Ex List	Heather Leonard	14	\$0.25	True	No	-	\$3.50
6/15/2020	COPY	Billable Copies - Doc. 86 - Def Proposed Jury Charges	Heather Leonard	43	\$0.25	True	No	-	\$10.75
6/15/2020	COPY	Billable Copies - Doc. 82 - PL Proposed Jury Charges	Heather Leonard	44	\$0.25	True	No	-	\$11.00
6/15/2020	COPY	Billable Copies - Doc. 88 - Def Response to Motion to Lead	Heather Leonard	20	\$0.25	True	No	-	\$5.00
6/15/2020	COPY	Billable Copies - Doc. 92 - PL Voire Dire	Heather Leonard	11	\$0.25	True	No	-	\$2.75
6/15/2020	COPY	Billable Copies - Doc. 87 - Def Response to Obj to Wit List	Heather Leonard	70	\$0.25	True	No	-	\$17.50
6/15/2020	COPY	Billable Copies - Doc. 85 - Def Motion in Limine	Heather Leonard	10	\$0.25	True	No	-	\$2.50
6/15/2020	COPY	Billable Copies - Doc. 90 - PI Resp to Def Obj to PI Ex List	Heather Leonard	10	\$0.25	True	No	-	\$2.50
6/15/2020	COPY	Billable Copies - Doc. 89 - Def Voir Dire	Heather Leonard	4	\$0.25	True	No	-	\$1.00

6/15/2020	COPY	Billable Copies - Doc. 91 - PL Resp to Def Obj to Depo Desig	Heather Leonard	6	\$0.25	True	No	-	\$1.50
6/8/2020		Carry over expenses from old billing program	Heather Leonard	1	\$2968.68	True	No	-	\$2,968.68
6/8/2020	COPY	Billable Copies - Def Obj to PL Witness List	Heather Leonard	36	\$0.25	True	No	-	\$9.00
6/8/2020	COPY	Billable Copies - Doc. 79 -Def Obj to PL Exhibit List	Heather Leonard	10	\$0.25	True	No	-	\$2.50
6/3/2020	COPY	Billable Copies - Doc. 77 - PI Obj to Def Exhibit List	Heather Leonard	18	\$0.25	True	No	-	\$4.50
5/26/2020	COPY	Billable Copies - Doc. 75 - Def Ex List	Heather Leonard	3	\$0.25	True	No	-	\$0.75
5/26/2020	COPY	Billable Copies	Heather Leonard	4	\$0.25	True	No	-	\$1.00
5/21/2020	COPY	Billable Copies - Doc. 74 - Objection to Motion to Lead	Heather Leonard	24	\$0.25	True	No	-	\$6.00
5/21/2020		April PACER Billing	Heather Leonard	0	\$5.40	True	No	-	\$0.00
5/19/2020	COPY	Billable Copies - Doc. 72 - Motion to lead	Heather Leonard	6	\$0.25	True	No	-	\$1.50
5/11/2020	COPY	Billable Copies - Doc. 70 - PL Exhibit List	Heather Leonard	9	\$0.25	True	No	-	\$2.25
5/11/2020	COPY	Billable Copies - Doc. 69 - PL Witness List	Heather Leonard	7	\$0.25	True	No	-	\$1.75
5/7/2020	COPY	Billable Copies - Doc. 68 - Order Setting Final Pretrial Conference	Heather Leonard	1	\$0.25	True	No	-	\$0.25
Total - Write offs									\$0.00
Total - Unbillable									\$0.00
Total - Billable									\$7,771.13
Total									\$7,771.13

Expenses from old billing program

Case 2:17-cv-00425-KPP Document 158-1 Filed 03/24/22 Page 59 of 62

Date	Description	Hours	Rate	Total
	Previous Balance			\$0.00
3/31/2010	copies engagement letter to client / cc Burgess		34 @ \$0.15	\$5.10
3/31/2010	file set up and File Storage Fee			\$300.00
3/31/2010	postage engagement letter to client / cc Burgess		2 @ \$0.78	\$1.56
4/22/2010	copies letter to client re: damages		9 @ \$0.15	\$1.35
4/22/2010	copies letter to client re: EEOC charge and preparing narrative		3 @ \$0.15	\$0.45
4/22/2010	postage letter to client re: damages			\$0.61
4/22/2010	postage letter to client re: EEOC charge and preparing narrative			\$0.44
4/29/2010	copies letter to eeoc re filing her charge		2 @ \$0.44	\$0.88
9/23/2010	copies letter to client re eeoc investigator		3 @ \$0.15	\$0.45
9/23/2010	copies letter to eeoc re position statement/interview		2 @ \$0.15	\$0.30
9/23/2010	postage letter to client re eeoc investigator			\$0.44
9/23/2010	postage letter to eeoc re position statement/interview			\$0.44
10/26/2010	fax fax from client		12 @ \$0.75	\$9.00
11/5/2010	copies letter to eeoc re RFI		4 @ \$0.15	\$0.60
11/5/2010	fax letter to eeoc re RFI		4 @ \$0.75	\$3.00
11/5/2010	postage letter to eeoc re RFI			\$0.44
1/28/2011	copies status letter to client		2 @ \$0.15	\$0.30
1/28/2011	postage status letter to client			\$0.44
1/24/2012	postage Letter to client			\$0.45
4/20/2012	Postage Letter to client & SASE			\$1.10
3/27/2013	Mileage Office to EEOC to file charge			\$12.87
4/4/2013	E101 Copying Letter to client re: filing of eeoc charge and timeline		6 @ \$0.20	\$1.20
4/4/2013	E101 Copying Letter to Kim Fehl re filing and mediation (file and mail copy)		10 @ \$0.20	\$2.00
4/4/2013	E104 Facsimile Letter to Kim Fehl re filing and mediation		5 @ \$1.00	\$5.00
4/4/2013	Postage Letter to City attorney re new EEOC charge			\$0.46
4/4/2013	Postage Ltr to client re new EEOC charge			\$0.66
6/24/2013	Postage Postage 5/24 - 6/23			\$0.86
7/29/2013	Copies		2 @ \$2.00	\$4.00
8/2/2013	Copies			\$0.25
8/2/2013	Fax		2 @ \$1.00	\$2.00

Date	Description	Hours	Rate	Total
12/10/2013	copies letter regarding status - EEOC			\$0.25
1/6/2014	E101 Copying 1/02/14 email from client and HL's 1/06/13 response from HL		2 @ \$0.25	\$0.50
1/6/2014	E101 Copying Mail and file copy - letter to eeoc re: additional information and request for rebuttal meeting		8 @ \$0.25	\$2.00
1/6/2014	E104 Facsimile Fax to eeoc re: additional information and request for rebuttal meeting		005 @ \$1.00	\$5.00
2/4/2014	copies print and copy letter to EEOC		4 @ \$0.25	\$1.00
3/11/2014	E101 Copying Letter to EEOC re additional act of retaliation/discrimination - promotion of Jessica Rowe to Field Examiner		04 @ \$0.25	\$1.00
3/11/2014	E104 Facsimile Letter to EEOC re additional act of retaliation/discrimination - promotion of Jessica Rowe to Field Examiner		003 @ \$1.00	\$3.00
4/10/2014	copies Print and copy status letter to client;		2 @ \$0.25	\$0.50
6/25/2014	E101 Copying response to EEOC summary letter		04 @ \$0.25	\$1.00
6/25/2014	E104 Facsimile response to EEOC summary letter		003 @ \$1.00	\$3.00
6/22/2015	E101 Copying Letter to City of Montgomery re: discrimination (file and mail copy)		08 @ \$0.25	\$2.00
6/22/2015	E104 Facsimile Letter to City of Montgomery re: discrimination		004 @ \$1.00	\$4.00
10/28/2015	E101 Copying Response to EEOC summary letter		08 @ \$0.25	\$2.00
10/28/2015	E104 Facsimile Response to EEOC summary letter		008 @ \$1.00	\$8.00
7/3/2017	Filing Fee			\$400.00
7/3/2017	Postage Postage for cert mail service packet and FedEx to Clerk's office			\$27.60
7/6/2017	E101 Copying Doc. 4 - Notice of Assignment to US Magistrate Judge			\$0.25
7/12/2017	E101 Copying Doc. 5 - Service Notice		02 @ \$0.25	\$0.50
8/1/2017	E101 Copying Doc. 10 - Order of Court		05 @ \$0.25	\$1.25
8/1/2017	E101 Copying Doc. 6 - Motion to Dismiss		3 @ \$0.25	\$0.75
8/1/2017	E101 Copying Doc. 7 - Conflict Disclosure Statement		002 @ \$0.25	\$0.50
9/14/2017	A104 Review/analyze Review Memo Opinion and Order (Doc. 14)			\$35.00
9/14/2017	E101 Copying Memo Opinion and Order (Doc. 14)		04 @ \$0.25	\$1.00
9/15/2017	E106 Online research August LEXIS Billing			\$40.52
9/22/2017	E101 Copying Doc. 16 - Rule 26(f) Order		02 @ \$0.25	\$0.50
9/22/2017	E101 Copying Review Doc. 15 - Answer		07 @ \$0.25	\$1.75

Date	Description	Hours	Rate	Total
9/28/2017	E101 Copying PLs first request for Rogs and RPD - 2017.09.28		35 @ \$0.25	\$8.75
10/2/2017	E101 Copying Doc. 18 - Uniform Scheduling Order		05 @ \$0.25	\$1.25
10/23/2017	copies Plaintiff's initial disclosures P001 - P276		276 @ \$0.25	\$69.00
10/31/2017	E101 Copying Defendant's Initial Disclosure Documents D1-D422		0422 @ \$0.25	\$105.50
2/1/2018	E101 Copying Letter to client about deposition settings and how to prepare for her deposition (file and mail copies)		14 @ \$0.25	\$3.50
3/27/2018	Witness Fee Witness fees for depositions: Douglas, Hacker, Wilson, Downes			\$270.76
5/22/2018	Pacer Download/Print			\$4.80
8/22/2018	Correspondence Sample Discovery Letter 3			\$12.00
8/22/2018	Printing 2015-2017 Tax Returns		25 @ \$0.25	\$6.25
8/22/2018	Printing Sample Discovery Letter 3		22 @ \$0.25	\$5.50
8/31/2018	Printing First PL Answers to Discovery		42 @ \$0.25	\$10.50
9/14/2018	Correspondence Disc verification signature - letter			\$12.00
9/14/2018	Printing Disc verification signature - letter		19 @ \$0.25	\$4.75
9/14/2018	Printing Sub Depos - 2018.09.17		21 @ \$0.25	\$5.25
9/17/2018	E101 Copying Copies for deposition exhibits		0536 @ \$0.25	\$134.00
9/24/2018	Printing Return of Service - Hacker and Downs		14 @ \$0.25	\$3.50
9/27/2018	Printing Doc. 23 - Order - Schedule Mediation			\$0.25
10/3/2018	Correspondence Mediation letter			\$12.00
10/3/2018	E101 Copying Doc. 29 - Mediation Order		02 @ \$0.25	\$0.50
10/3/2018	Printing Mediation letter		4 @ \$0.25	\$1.00
10/15/2018	Postage Postage for Sep 2018			\$1.78
10/17/2018	Printing Motion to Continue [doc 30]		4 @ \$0.25	\$1.00
10/19/2018	Printing Doc. 31 - Order 0 PL Show cause - Motion to continue			\$0.25
10/25/2018	Printing Doc. 32 - PLs Response to Show Cause Order		2 @ \$0.25	\$0.50
10/25/2018	Printing Doc. 33 - Doc. 30 is granted		003 @ \$0.25	\$0.75
11/1/2018	Copies Copies of depositions - Office Max			\$39.28
11/5/2018	Postage Oct 2018 Postage			\$0.47
11/19/2018	E110 Out-of-town travel Drive to and from Montgomery for deposition of Mary Wiggins			\$89.96

Date	Description	Hours	Rate	Total
11/26/2018	Postage FedEx depo notices to process server (Douglas & Wilson)			\$20.81
11/26/2018	Service of Process Service for depo subpoenas : Carmen Dougls & Charles Wilson. Central Alabama Process Service			\$226.00
11/26/2018	Witness Fee Witness fee: Charles Wilson & Carmen Douglas #7577 ᶤ		2 @ \$45.00	\$90.00
1/2/2019	E101 Copying Doc. 39 - Defendant's Motion for Summary Judgment		352 @ \$0.25	\$88.00
1/7/2019	pacer Download/Print Pacer Printing for Nov and Dec		6 @ \$4.30	\$0.60
1/15/2019	E115 Deposition transcripts Alabama Court Reporting Invoice 17681 - Transcripts of Charles Wilson, Carmen Douglas. Check #7599			\$290.20
1/30/2019	E101 Copying Doc. 44 - Defendant's MSJ Reply Brief		014 @ \$0.25	\$3.50
2/21/2019	pacer Download/Print January Pacer Billing		45 @ \$0.10	\$4.50
4/24/2019	E115 Deposition transcripts Deposition of Mary Wiggins - Baker COurt Reporting - invoice 71973 - paid with firm check 7639			\$534.50
7/19/2019	pacer June 2019 Pacer		47 @ \$0.10	\$4.70
2/25/2020	Pacer Pacer billing for January 2020		6 @ \$0.10	\$0.60
4/16/2020	pacer Pacer billing for March 2020		7 @ \$0.10	\$0.70
	Amount Due	0.00		\$2,968.68